

## REMARKS

Applicant respectfully requests reconsideration of this application as amended. Claims 1-23, 25-29 and 48-53 are currently pending in this application. Claims 1, 16, 19, 23, 25, 26, 28, and 29 have been amended, and claim 24 is canceled herein.

### Claim Rejections - 35 U.S.C. §112

Claim 29 is rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claim 29 has been amended to correct any antecedent basis deficiency. Applicant believes this rejection no longer applies. In light of the foregoing amendment applicant respectfully requests the Examiner to withdraw the rejection under 35 U.S.C. 112, second paragraph.

### Claim Rejections - 35 U.S.C. §102

Claims 1, 9-12, and 28-29 are rejected under 35 USC 102(e) as being anticipated by U.S. Patent No. 6,511,048 to Bayan et al. Applicant respectfully disagrees.

As to the independent claims, Banyan fails to teach receptor sites. The Office Action stated that the phrase receptor site is interpreted as meaning a location which accepts functional blocks. Banyan fails to teach even the Examiner's own definition:

"Generally, the matrix of devices are connected to each other." (Col.4, lines 44-46)  
It is readily apparent that what Banyan teaches is a wafer. The wafer, or matrix as Banyan calls it, needs to be destroyed in order to separate the dies from the wafer:

"Usually, the devices are separated with a circular saw." (Col. 4, lines 48-49)  
Applicant fails to understand how a wafer which is cut apart (and thus destroyed) with a circular saw can justifiably interpreted as a tool with a plurality of receptor sites, even using the broadest

interpretation of the claims. Furthermore the matrix 60 is not a tool, nor is it relocating anything. The matrix is the source of the dies; therefore it cannot be attributed to the act of relocation, and relevant structure attributed to the act.

In the interest of expediting the prosecution of this application, the applicant has amended the claims to require: "wherein at least one of said receptor sites is a recessed region within said relocating tool, the recessed region designed to closely fit at least a portion of a single functional block". Clearly, Banyan does not teach recessed regions.

In light of the foregoing arguments and amendments herein applicant believes that claims 1, 9-12, and 28-29 are not anticipated by Banyan, and respectfully requests the Examiner to withdraw the rejection under 35 U.S.C. 102(e).

Claims 28-29 are rejected under 35 USC 102(e) as being anticipated by U.S. Patent No. 6,742,561 to Nam et al. Applicant respectfully disagrees.

The argument to Banyan similarly applies to Nam. Nam does not teach receptor sites; Nam plainly teaches a wafer 70, and not a tool. The wafer 70 rests on a wafer table 56. Clearly a wafer would rest on a "wafer table". There is no evidence that the wafer table 56 includes any receptor sites.

In the interest of expediting the prosecution of this application, the applicant has amended the claims to require: "wherein at least one of said receptor sites is a recessed region within said relocating tool, the recessed region designed to closely fit at least a portion of a single functional block". Clearly, Nam does not teach recessed regions.

In light of the foregoing arguments applicant believes that claims 28 and 29 are not anticipated by Nam, and respectfully requests the Examiner to withdraw the rejection under 35 U.S.C. 102(e).

Claim Rejections - 35 U.S.C. §103(a)

The Examiner has not presented a proper case of obviousness for any of the rejected claims. It is well known that the Examiner has a responsibility of making sure that the standard of patentability enunciated by the Supreme Court and by the Congress is applied in each and every case. The Examiner has failed to enunciate any of the factors relating to a finding of obviousness which the Supreme Court presented in *Graham v. John Deere*, 383 U.S. 1, 148 USPQ 459 (1966). The Supreme Court reemphasized the importance of the above factors recently in *KSR v. Teleflex*, 550 U.S. \_\_\_, 127 S. Ct. 1727 (2007).

Thus without properly constructed rejections, the applicant believes that the obviousness rejections have been constructed purely from hindsight in light of the applicant's disclosure. Furthermore the applicant further believes that because of the improper nature of the obvious rejections, the applicant cannot properly respond to the rejections.

In light of the above, the applicant requests that each and every obviousness rejection be properly presented for each and every claim or alternatively withdrawn.

Claims 1, 3, 6-7, 9-12, and 16-17 are rejected under 35 U.S. 103(a) as being unpatentable over U.S. Patent No. 6,742,561 to Nam et al, in view of U.S. Patent No. 6,511,048 to Bayan et al. Applicant respectfully disagrees. Even assuming that a proper case of obviousness has been presented, this combination still fails to teach each and every claim element. The combination does not teach receptor sites, nor does it teach the newly amended recessed regions. For these reasons alone the combination is improper. Accordingly the applicant requests withdrawal of this rejection.

Claims 1, 9, 12, and 16-22 are rejected under 35 U.S. 103(a) as being unpatentable over U.S. Patent No. 5,765,277 to Jin et al, in view of U.S. Patent No. 6,511,048 to Bayan et al. Applicant respectfully disagrees. Even assuming that a proper case of obviousness has been presented, this combination still fails to teach each and every claim element. The combination does not teach receptor sites, nor does it teach the newly amended recessed regions. For these

reasons alone the combination is improper. Accordingly the applicant requests withdrawal of this rejection.

Claim 2 is rejected under 35 U.S. 103(a) as being unpatentable over U.S. Patent No. 6,742,561 to Nam et al. in view of U.S. Patent No. 6,511,048 to Bayan et al., as applied to claims 1, 3, 6-7, 9-12, and 16-27 above, and further in view of U.S. Patent No. 6,193,136 to Higashi et al. Applicant respectfully disagrees, as shown above the combination to the base claim is improper which the addition of Higashi fails to remedy. Accordingly the applicant requests withdrawal of this rejection.

Claims 4-5 are rejected under 35 U.S. 103(a) as being unpatentable over U.S. Patent No. 6,742,561 to Nam et al. in view of U.S. Patent No. 6,511,048 to Bayan et al., as applied to claims 1, 3, 6-7, 9-12, and 16-27 above, and further in view of U.S. Patent No. 6,261,871 to Langari et al. Applicant respectfully disagrees, as shown above the combination to the base claim is improper which the addition of Langari fails to remedy. Accordingly the applicant requests withdrawal of this rejection.

Claims 8 and 13-15 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,742,561 to Nam et al., in view of U.S. Patent 6,511,048 to Bayan et al., as applied to claims 1, 3, 6-7, 9-12, and 16-17 above, and further in view of U.S. Patent No. 5,904,545 to Smith et al. Applicant respectfully disagrees. As shown above the combination to the base claim is improper which the addition of Smith fails to remedy. Accordingly the applicant requests withdrawal of this rejection.

Claims 23-24 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,765,277 to Jin et al, in view of U.S. patent No. 6,511,048 to Bayan et al. and U.S. Patent No. 6,245,597 to Fernandez. Applicant respectfully disagrees. The combination does not teach a functional layer detachably coupled to a carrier. The combination also does not teach a substrate station for detaching the carrier. Accordingly the applicant requests withdrawal of this rejection.

Claims 25-27 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,765,277 to Jin et al, in view of U.S. patent No. 6,511,048 to Bayan et al. and U.S. Patent No. 6,245,597 to Fernandez as applied to claims 23-24 above, and further in view of U.S. patent No. 6,090,474 to Johansson et al. Applicant respectfully disagrees. As shown above the combination to the base claim is improper which the addition of Johansson fails to remedy. Applicant also notes that the Johansson fails to teach a substrate forming station for removing a carrier. Accordingly the applicant requests withdrawal of this rejection.

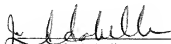
Applicant respectfully submits that in view of the amendments and arguments set forth herein, the applicable rejections have been overcome.

Please charge any shortages and credit any overcharges to our Deposit Account No. 02-2666.

Respectfully submitted,

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